

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	Chapter 11
)	
W. R. GRACE & CO., <i>et al.</i> ,)	Case No. 01-1139 (JKF)
)	(Jointly Administered)
Debtors.)	

Related Docket Nos. 9622, 10910, 10913, 10917, 10930, 10999
November 14, 2005 Agenda Item No. 8.

**DEBTORS' MOTION FOR LEAVE TO FILE A REPLY WITH RESPECT TO ITS
MOTION FOR AN ORDER ESTABLISHING A PROOF OF CLAIM BAR DATE FOR
ASBESTOS PERSONAL INJURY PRE-PETITION LITIGATION CLAIMS**

The above-captioned debtors and debtors in possession (collectively, the "Debtors") hereby request authority pursuant to Del. Bankr. L.R. 9006-1(d) to file a reply in further support of the Debtors' Motion for an Order Establishing a Proof of Claim Bar Date for Asbestos Personal Injury Pre-Petition Litigation Claims (Docket No. 9622) (the "Motion"), which is currently scheduled for hearing before this Court on November 14, 2005 at 12:00 p.m.

On October 28, 2005, the Official Committee of Asbestos Personal Injury Claimants, the Future Claimants' Representative, and certain law firms represented by Stutzman, Bromberg, Esserman & Plifka each filed an objection to the Motion. Although the Debtors will respond to the majority of the arguments raised in the objections at the hearing on November 14, 2005, certain fundamental mischaracterizations regarding the relief requested in the Motion, the Debtors' "motives" and applicable case law require immediate correction in order to prevent an obscuring of the issues relevant to an accurate adjudication of the Motion. Accordingly, the Debtors seek leave to file a reply in order to correct these mischaracterizations.

WHEREFORE, the Debtors respectfully request entry of an Order granting authority to file the reply, which is attached hereto.

Dated: Wilmington, Delaware
November 4, 2005

Respectfully submitted,

KIRKLAND & ELLIS LLP

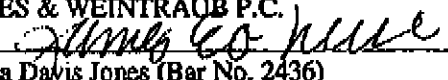
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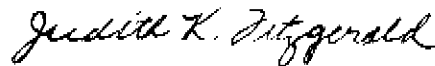
-and-

PACHULSKI, STANG, ZIEHL, YOUNG,
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SO ORDERED this 20th day
of November, 2005



The Honorable Judith K. Fitzgerald
United States Bankruptcy Judge